

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 21-173 (PJS/DTS)

UNITED STATES OF AMERICA,

SUPERSEDING INDICTMENT

Plaintiff,

18 U.S.C. § 2

18 U.S.C. § 1591

v.

18 U.S.C. § 1594

21 U.S.C. § 853

1. ANTON JOSEPH LAZZARO,

28 U.S.C. § 2461

a/k/a Tony Lazzaro,

a/k/a Tony,

Defendant.

THE UNITED STATES GRAND JURY CHARGES THAT:

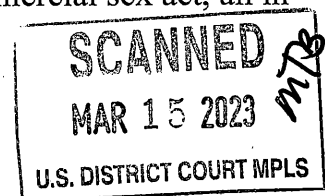
COUNT 1

(Conspiracy To Commit Sex Trafficking of Minors)

From in or about May 2020 through in or about December 2020, in the State and District of Minnesota, the defendant,

**ANTON JOSEPH LAZZARO,
a/k/a Tony Lazzaro,
a/k/a Tony,**

in and affecting interstate commerce, conspired with Gisela Castro Medina and others known and unknown to the Grand Jury to knowingly recruit, entice, harbor, transport, provide, obtain, maintain, patronize, and solicit by any means minors, namely MINOR VICTIMS A, B, C, D, and E knowing and in reckless disregard of the fact and having had a reasonable opportunity to observe that MINOR VICTIMS A, B, C, D, and E had not attained the age of 18 years and would be caused to engage in a commercial sex act, all in



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violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(2), 1591(c), and 1594(c).

COUNT 2

(Sex Trafficking of a Minor)

From in or about May 2020 through in or about June 2020, in the State and District of Minnesota, the defendant,

**ANTON JOSEPH LAZZARO,
a/k/a Tony Lazzaro,
a/k/a Tony,**

and Gisela Castro Medina, aiding and abetting each other, in and affecting interstate commerce, knowingly did and attempted to recruit, entice, harbor, transport, provide, obtain, maintain, patronize, and solicit MINOR VICTIM A, knowing and in reckless disregard of the fact that, and having had a reasonable opportunity to observe that, MINOR VICTIM A had not attained the age of 18 years and would be caused to engage in a commercial sex act, all in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(2), 1591(c), 1594(a), and 2.

COUNT 3

(Sex Trafficking of a Minor)

From in or about June of 2020 through in or about July of 2020, in the State and District of Minnesota, the defendant,

**ANTON JOSEPH LAZZARO,
a/k/a Tony Lazzaro,
a/k/a Tony,**

and Gisela Castro Medina, aiding and abetting each other, in and affecting interstate commerce, knowingly did and attempted to recruit, entice, harbor, transport, provide,

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obtain, maintain, patronize, and solicit MINOR VICTIM B, knowing and in reckless disregard of the fact that, and having had a reasonable opportunity to observe that, MINOR VICTIM B had not attained the age of 18 years and would be caused to engage in a commercial sex act, all in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(2), 1591(c), 1594(a), and 2.

COUNT 4

(Sex Trafficking of a Minor)

From in or about June of 2020 through in or about October of 2020, in the State and District of Minnesota, the defendant,

ANTON JOSEPH LAZZARO,
a/k/a Tony Lazzaro,
a/k/a Tony,

and Gisela Castro Medina, aiding and abetting each other, in and affecting interstate commerce, knowingly did and attempted to recruit, entice, harbor, transport, provide, obtain, maintain, patronize, and solicit MINOR VICTIM C, knowing and in reckless disregard of the fact that, and having had a reasonable opportunity to observe that, MINOR VICTIM C had not attained the age of 18 years and would be caused to engage in a commercial sex act, all in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(2), 1591(c), 1594(a), and 2.

COUNT 5

(Sex Trafficking of a Minor)

From in or about September of 2020 through in or about October of 2020, in the State and District of Minnesota, the defendant,

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**ANTON JOSEPH LAZZARO,
a/k/a Tony Lazzaro,
a/k/a Tony,**

and Gisela Castro Medina, aiding and abetting each other, in and affecting interstate commerce, knowingly did and attempted to recruit, entice, harbor, transport, provide, obtain, maintain, patronize, and solicit MINOR VICTIM D, knowing and in reckless disregard of the fact that, and having had a reasonable opportunity to observe that, MINOR VICTIM D had not attained the age of 18 years and would be caused to engage in a commercial sex act, all in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(2), 1591(c), 1594(a), and 2.

COUNT 6
(Sex Trafficking of a Minor)

From in or about August of 2020 through in or about October of 2020, in the State and District of Minnesota, the defendant,

**ANTON JOSEPH LAZZARO,
a/k/a Tony Lazzaro,
a/k/a Tony,**

and Gisela Castro Medina, aiding and abetting each other, in and affecting interstate commerce, knowingly did and attempted to recruit, entice, harbor, transport, provide, obtain, maintain, patronize, and solicit MINOR VICTIM E, knowing and in reckless disregard of the fact that, and having had a reasonable opportunity to observe that, MINOR VICTIM E had not attained the age of 18 years and would be caused to engage in a commercial sex act, all in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(2), 1591(c), 1594(a), and 2.

COUNT 7

(Sex Trafficking – Obstruction)

In or about March of 2021, in the State and District of Minnesota, the defendant,

ANTON JOSEPH LAZZARO,
a/k/a Tony Lazzaro,
a/k/a Tony,

and Gisela Castro Medina, aiding and abetting each other, knowingly and intentionally obstructed, and attempted to obstruct, and knowingly and intentionally interfered with and prevented the enforcement of Title 18, United States Code, Section 1591(a), all in violation of Title 18, United States Code, Sections 1591(d) and 2.

FORFEITURE ALLEGATIONS

Counts 1 through 7 of this Superseding Indictment are fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 1594.

As a result of the offenses charged in Counts 1 through 7, the defendant shall forfeit the following property to the United States pursuant to Title 18, United States Code, Section 1594:

- (1) Any property, real or personal, involved in, used or intended to be used to commit or to facilitate the commission of the offenses, and any property traceable to such property; and
- (2) Any property, real or personal, constituting or derived from, any proceeds obtained, directly or indirectly, as a result of the offenses, or any property traceable to such property.

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The property subject to forfeiture includes, but is not limited to:

- (a) the real property located at 201 11th Street South, #1920, Minneapolis, MN 55402, with property ID number 27-029-24-14-0589;
- (b) a 2010 Ferrari convertible, VIN ZFF65LJA9A0173846;
- (c) an Apple iPhone model A1662 cellphone seized from 201 11th Street South, #1920, Minneapolis, MN 55402 on December 15, 2020;
- (d) a Blackberry cellphone with 32 GB SD Card with IMEI: 015103000107958;
- (e) a Google Pixel 4A cellphone, Model G025 with IMEI 358118100229242;

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON